

# **Exhibit C**

**quinn emanuel trial lawyers | new york**

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
(212) 849-7282

WRITER'S INTERNET ADDRESS  
andrewrossman@quinnemanuel.com

March 21, 2014

**VIA E-MAIL**

Ian Boczeko  
Wachtell, Lipton, Rosen & Katz  
51 West 52nd Street  
New York, New York 10019

Re: LBHI v. JPMorgan Adversary Proceeding No. 10-03266 (SCC)  
Side Letter to Protective Order Entered September 1, 2010

Dear Ian:

The following agreement between JPMorgan Chase Bank, N.A. ("JPMorgan"), Lehman Brothers Holdings Inc. ("LBHI") and the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. (the "Committee" and, together with JPMorgan and LBHI, the "Parties") supplements the Confidentiality Stipulation and Protective Order entered by Judge Peck on September 1, 2010 (the "Protective Order") with respect to the Parties' Highly Confidential Discovery Materials. The Parties hereby agree through their undersigned counsel that the following language be added to the end of the second sentence in section 4 of the Protective Order:

; and (l) current employees, officers or directors of the Parties (separate from inside counsel contemplated by part (c) of this paragraph) who are consulted for the purpose of assisting outside counsel of record who has appeared in the Litigation on behalf of a Party to the Litigation, provided that no Party shall disclose the Highly Confidential Discovery Material that the Party receives to more than thirty (30) current employees, officers or directors of the Party.

DATED: March , 2014

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By 

Name: Andrew J. Rossman

Title: Partner

Counsel for The Official Committee of Unsecured  
Creditors of Lehman Brothers Holdings Inc.

Agreed and Accepted:

DATED: March 21, 2014

WACHTELL, LIPTON, ROSEN & KATZ

By 

Name: Ian Doczko

Title: Partner

Counsel for JPMorgan Chase Bank, N.A.

DATED: March 22, 2014

CURTIS, MALLET-PREVOST, COLT & MOSLE  
LLP

By 

Name: Peter J. Behmke

Title: Partner

Counsel for Lehman Brothers Holdings Inc.